



AMERICAN PETROLEUM INSTITUTE

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Friday, December 14, 2018

Via Electronic Filing

Chief Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) of the Commission's Rules

Dear *Mr. Stockdale*:

The Telecommunications Subcommittee of the American Petroleum Institute ("API"), urge the Federal Communications Commission ("Commission") to grant the Wireless Internet Service Providers Association ("WISPA") and the Utilities Technology Council ("UTC") joint petition for waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) (collectively, the "Transition Rules") for incumbent licensees of spectrum in the 3650 to 3700 MHz range ("Licensees").

API agrees that the grant of this waiver to afford Licensees additional time to complete the transition of their operations to the Citizens Broadband Radio Service ("CBRS") is within this interest of the Oil & Gas industry. Also, given the nature of CBRS and its relation to the smaller 3650-3700 MHz band, this extension would not encumber Priority Access within CBRS, making this extension of minimal disruption to any new operations.

Respectfully submitted,

/s/

James Crandall
API